

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

PELIN KOHN, PhD,,	)	
Plaintiff	)	
	)	
v.	)	Case No.: 2:25-cv-325
	)	
NORWICH UNIVERSITY,	)	
Defendant.	)	

**NOTICE OF REMOVAL**

Defendant, Norwich University (“Norwich”), by and through its undersigned counsel, pursuant to 28 U.S.C. §§ 1332, 1367, 1441, and 1446, hereby notifies this Court that it is removing the above-captioned action currently pending in the Vermont Superior Court, Civil Division, Washington Unit, to the United States District Court for the District of Vermont. In support, Norwich states as follows:

**Introduction**

1. On March 10, 2025, Plaintiff, Pelin Kohn, commenced this employment discrimination action in the Vermont Superior Court, Civil Division, Washington Unit, titled *PELIN KOHN v. NORWICH UNIVERSITY*, Civil Docket No. 25-CV-01046. A copy of Plaintiff’s Complaint is attached as Exhibit A.
2. In this employment action, Plaintiff claims damages arising from her resignation from Norwich in Fall 2024 (*See* Ex. A, at ¶ 83). Plaintiff alleges seven causes of action against Norwich: “Discrimination Based on National Origin and Gender” (Count I); “Retaliation” (Count II); “Discrimination for Taking Leave Under the FMLA and Vermont’s PFLA” (Count III); “Retaliation for Taking Leave Under Vermont’s PFLA and the FMLA” (Count IV); “Failure to Provide a Comparable Job” (Count V);

“Promissory Estoppel” (Count VI); and “Breach of Implied Employment Contract and Covenant of Good Faith and Fair Dealing” (Count VII). (*See* Ex. A).

3. Norwich was served with a copy of the Summons and Complaint on March 13, 2025.
4. Pursuant to 28 U.S.C. §1446(b), this Notice of Removal is timely filed within thirty days of service of the Summons and Complaint on Norwich.

### **Venue**

5. The United States District Court for the District of Vermont is the federal judicial district encompassing Washington County, Vermont. Therefore, for purposes of this Notice of Removal, venue lies in this Court pursuant to 28 U.S.C. §1441(a).

### **Federal Question Jurisdiction**

6. This Court has jurisdiction pursuant to 28 U.S.C. §1331 on the basis that the civil action arises under the laws of the United States. Specifically, Counts IV and V arise under the Family and Medical Leave Act (“FMLA”), 29 U.S.C. § 2601 et seq. (*See* Ex. A).
7. The Court has supplemental jurisdiction over the remaining state law claims pursuant to 28 U.S. Code § 1367(a) because they are “so related to claims in the action within such original jurisdiction that they form part of the same case or controversy under Article III of the United States Constitution.”
8. Pursuant to 28 U.S.C. §1446(a), a copy of all process, pleadings, and orders served upon Norwich is attached as Exhibit B.
9. Pursuant to 28 U.S.C. §1446(b)(2)(A), Norwich hereby states that at the time of filing this Notice of Removal, it is not aware of any other defendant to this action from whom consent to removal is required.

10. Prompt written notice of this Notice of Removal is being sent to Plaintiff through counsel, and to the Clerk of the Vermont Superior Court, Civil Division, Lamoille Unit, as required by 28 U.S.C. §1446(d).
11. By this Notice of Removal, Norwich is not waiving and expressly reserves its right to contest personal jurisdiction, venue, and the sufficiency of the Complaint, and its right to assert any defense available to it under any state or federal statute.
12. Norwich requests a jury trial.

WHEREFORE, Defendant, NORWICH UNIVERSITY, respectfully gives notice that the above action, now pending against it in the Vermont Superior Court, Civil Division, Washington Unit, is removed to the United States District Court for the District of Vermont, pursuant to 28 U.S.C. §§ 1331, 1367, 1441, and 1446.

Dated at Burlington, Vermont this 17<sup>th</sup> day of March, 2025.

Respectfully submitted,

NORWICH UNIVERSITY

By: /s/Pietro J. Lynn  
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